

EXHIBIT O

Minga, Jay

From: Vora, Samir <SVora@milbank.com>
Sent: Tuesday, June 4, 2019 12:35 PM
To: Minga, Jay
Cc: Slack, Richard; Tran, An; Liou, Jessica; Peter Benvenuti; Singh, David; Leblanc, Andrew; Stone, Alan
Subject: RE: PG&E - Draft Protective Order

Jay, all of these edits are fine except we would like to revert to our version of the “Timing of Challenge to Confidentiality Designations” provision (no issue with the re-ordering of that section).

Happy to discuss.

Samir L. Vora | [Milbank](#) | Special Counsel
1850 K Street, NW, Suite 1100 | Washington D.C. 20006
T: +1 202.835.7544
svora@milbank.com | milbank.com

*Not yet admitted to practice in D.C. Admitted to practice in California.

From: Minga, Jay [mailto:Jay.Minga@weil.com]
Sent: Monday, June 3, 2019 9:24 PM
To: Vora, Samir <SVora@milbank.com>
Cc: Slack, Richard <richard.slack@weil.com>; Tran, An <An.Tran@weil.com>; Liou, Jessica <jessica.liou@weil.com>; Peter Benvenuti <pbenvenuti@kellerbenvenuti.com>; Singh, David <David.Singh@weil.com>
Subject: PG&E - Draft Protective Order

Samir,

Thank you very much again for your comments on the draft protective order. We’ve accepted virtually all your suggested changes, with a few limited exceptions that we explain below. Also, for your convenience we have attached a revised clean version along with a redline against the last received from you. Please note that this new version also incorporates edits and comments from the TCC, which accounts for virtually all of the changes not suggested by the UCC.

We did not modify the “Highly Confidential” and “Professional Eyes Only” designations because Debtors have already anticipated using both designations on documents.

Regarding Professional Eyes Only Material, we have accepted your suggestion that adverse witnesses be allowed to review Professional Eyes Only Material, subject to the witnesses signing an “Acknowledgement and Agreement to Be Bound (Exhibit A).”

We largely accepted your proposed paragraph 7.6 regarding use of protected material in open court. We propose, however, that the party seeking to offer or use protected material would be best situated to seek relief from court, since that party knows of its own need to seek relief in advance of the 72 hours’ notice to the other party. This allocation would also permit keeping the notice period to 72 hours before the intended use without potentially prejudicing the Producing Party. We further propose that it would be appropriate and consistent with precedent that absent relief the party seeking to use protected material would not be permitted to make use of it in open court.

Lastly, we have accepted the extension of time to return Protected Material and agree with portions of your proposed language as to the final disposition of Protected Material, including retention of certain work product, etc., and have proposed additional language and options consistent with Judge Montali's past protective orders.

We hope that these changes work. We are available for a call if you would like to discuss any of the foregoing.

Thanks,
Jay



Jay Minga

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
Jay.Minga@weil.com
+1 212 310 8378 Direct
+1 646 467 2079 Mobile
+1 212 310 8007 Fax

The information contained in this email message is intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by email, postmaster@weil.com, and destroy the original message. Thank you.

=====

This e-mail message may contain legally privileged and/or confidential information. If you are not the intended recipient(s), or the employee or agent responsible for delivery of this message to the intended recipient(s), you are hereby notified that any dissemination, distribution or copying of this e-mail message is strictly prohibited. If you have received this message in error, please immediately notify the sender and delete this e-mail message from your computer.